

EXHIBIT “B”



Mary Marzolla <mmarzolla@fnmlawfirm.com>

RE: Mormile v. Accurate et al. Rockland Co. Index #34070-2019

1 message

Christopher G. Salloum <csalloum@lawfirm.ms>

Mon, Sep 9, 2019 at 10:04 AM

To: Mary Marzolla <mmarzolla@fnmlawfirm.com>, Donald Feerick <dfeerick@fnmlawfirm.com>

Thank you for confirming that your client remains interested in settlement. You previously declined to clearly express the same to us in response to our numerous inquiries.

I have conferred with our client regarding your offer. Given that your client's decision to initiate litigation in connection with this matter has caused our client to expend additional unnecessary legal costs, despite our repeated follow ups to you in July (before your commencement of this action) regarding the agreement we first sent you in early June, we offer to settle by way of a \$15,000 lump sum payment reportable on a 1099 to Plaintiff. We will exchange a settlement agreement.

Please send us a revised version of the settlement agreement we previously sent to you in June with your proposed changes and we will review it immediately, or, alternatively, please contact Derek regarding the same, and he can make those changes and send them to you for review. Please advise us today if your client will accept the offer. If we are unable to finalize settlement today, we request that, as a sign of your good faith intention to settle, you file a notice of discontinuance **without** prejudice today so that we can have sufficient time to finalize the agreement without also incurring additional legal fees preparing a response to your Verified Complaint. Of course, if negotiations regarding the agreement fail, and they will not, your client can always commence her action again.

Thank you. We look forward to settling this matter.

Best,

Chris

Christopher G. Salloum, Associate

Mandelbaum Salsburg P.C.

d. 973.607.1267

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9/30/2019

Feerick Nugent MacCartney, PLLC Mail - RE: Mormile v. Accurate et al. Rockland Co. Index #34070-2019

immediately by reply e-mail message or by telephone and delete the original message from your e-mail system and/or computer database.

From: VAL Drummond <valeried@fnmlawfirm.com>
Sent: Friday, September 6, 2019 3:18 PM
To: Christopher G. Salloum <csalloum@lawfirm.ms>
Cc: Mary Marzolla <mmarzolla@fnmlawfirm.com>; Donald Feerick <dfeerick@fnmlawfirm.com>
Subject: Mormile v. Accurate et al. Rockland Co. Index #34070-2019

[EXTERNAL]

Dear Mr. Salloum:

Annexed hereto please see correspondence from Mary Marzolla in connection with the above-referenced matter.

Thank you,

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****Please note that our email addresses have changed****

Valerie Drummond
Valeried@fnmlawfirm.com

Paralegal

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